

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION**

RHONDA BREAUX

NO.: 2:23-cv-01365

VERSUS

**JUDGE:
JAMES D. CAIN, JR.**

**MAGISTRATE JUDGE:
KATHLEEN KAY**

**NOVO NORDISK A/S, NOVO NORDISK
NORTH AMERICA OPERATIONS A/S,
NOVO NORDISK US HOLDINGS INC.,
NOVO NORDISK US COMMERCIAL
HOLDINGS INC., NOVO NORDISK INC.,
NOVO NORDISK RESEARCH CENTER
SEATTLE, INC., and NOVO NORDISK
PHARMACEUTICAL INDUSTRIES LP**

JOINT PROPOSED SCHEDULING ORDER

NOW INTO COURT, through undersigned counsel come Plaintiff, Rhonda Breaux (“Plaintiff”) and Defendants Novo Nordisk US Holdings Inc., Novo Nordisk US Commercial Holdings Inc., Novo Nordisk Inc., Novo Nordisk Research Center Seattle Inc., and Novo Nordisk Pharmaceutical Industries LP (collectively, “Defendants,” and together with Plaintiff, the “Parties”), which respectfully submit the following proposed deadlines for this matter:¹

- Parties to submit proposed ESI and Protective Orders by August 16, 2024.

¹ The Parties recognize that a Section 1407 motion is pending before the JPML. If an MDL is created, the Parties agree to engage in good faith and reasonable efforts to address scheduling issues.

- Defendants to serve initial disclosures the later of August 16, 2024 or 60 days after Defendants file an Answer.
- Fact (Non Expert) Discovery Completion deadline is October 3, 2025.
- Plaintiff's Expert Reports are due by November 7, 2025.
- Defendants' Expert Reports are due by December 16, 2025.
- Deadline to complete depositions of Experts is February 16, 2026.²
- *Daubert* / Dispositive Motions shall be served on March 16, 2026.
- Opposition briefs to *Daubert* Motions shall be served on or before April 22, 2026.
- Opposition briefs to Dispositive Motions shall be served on or before April 27, 2026.
- All Motions in Limine shall be served on or before May 18, 2026.
- Oppositions to Motions in Limine shall be served on or before June 15, 2026.
- All Deposition Designations and Exhibit lists shall be served on June 22, 2026.
- All objections to Designations and Counter Designations shall be served on July 13, 2026.
- All objections to Exhibits shall be served on July 15, 2026.
- All objections to counter designations shall be served on July 20, 2026.
- Jury trial to begin on September 14, 2026.

² Depositions of Plaintiffs' experts will be completed before depositions of Defendants' experts in the same discipline, absent agreement of the parties.

December 19, 2023

/s/ Michael Cox

Michael Cox (#22026)
Counsel for Plaintiff Rhonda Breaux

December 19, 2023

/s/ Diana Cole Surprenant

Diana Cole Surprenant (#33399)
Adams & Reese
*Counsel for Defendants Novo Nordisk US Holdings
Inc.; Novo Nordisk US Commercial Holdings Inc.;
Novo Nordisk Inc.; Novo Nordisk Research Center
Seattle Inc.; Novo Nordisk Pharmaceutical Industries
LP*